

# **Exhibit B**

 **KLAR, IZSAK & STENGER, L.L.C.**  
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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION, et al.,**

Plaintiffs and Counterclaim  
Defendants;

v.

**Case No. 4:16-cv-02163**

**PEOPLE FOR THE ETHICAL  
TREATMENT OF ANIMALS, INC., et al.,**

Defendants and  
Counterclaim Plaintiffs.

**PLAINTIFF/COUNTERCLAIM DEFENDANT CONNIE BRAUN CASEY'S  
SUPPLEMENTAL DISCLOSURES PURSUANT TO RULE 26(a)(1)**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, counsel of record for Plaintiff/Counterclaim Defendant Connie Braun Casey ("Ms. Casey") hereby gives supplemental notice of the following disclosures based on the information reasonably available to her.

1. Names, addresses, and phone numbers of each individual likely to have discoverable information, along with the subjects of that information, which Ms. Casey may use to support its claims or defenses, unless the use would be solely for impeachment:

**DISCLOSURE:**

- a. Ms. Casey: Ms. Casey is likely to have knowledge of the care, treatment, ownership and transfer of the chimpanzees that are the subject of the dispute. Ms. Casey may be contacted through the undersigned counsel.

- b. Counterclaim Defendant Angela Scott: Ms. Scott is likely to have knowledge of the care, treatment, ownership, and transfer of the chimpanzees that are the subject of the dispute. Ms. Scott may be contacted through her legal counsel in this matter.
- c. Dr. Doug Pernikoff: Dr. Pernikoff is likely to have knowledge of the care, treatment, and transfer of the chimpanzees that are the subject of the dispute. Dr. Pernikoff may be contacted by his legal counsel, Brent Baldwin, 314-720-6185, [brent@baldwin-lawgroup.com](mailto:brent@baldwin-lawgroup.com).

2. Copies, or a description by category and location, of all documents, electronically stored information, and tangible things in Ms. Casey's possession, custody or control, which Ms. Casey may use to support its claims or defenses, unless the use would be solely for impeachment:

**DISCLOSURE:**

Ms. Casey has in her possession and produces concurrently herewith the following documents, in addition to the document previously produced and/or identified by the parties and nonparties pursuant to subpoena:

- a. Enrichment log
- b. Missouri Primate Foundation business registration records
- c. Records from Dr. Doug Pernikoff
- d. USDA transfer documents
- e. Letter from Connie Casey to Deb Cobb
- f. Map of facility
- g. Note from Vito Stramaeglia
- h. USDA inspection reports

- i. Map and pictures of the facility
3. Computation of each category of damages claimed by Ms. Casey:

**DISCLOSURE:** Ms. Casey intends to seek recovery of damages for PETA's false, misleading and defamatory statements against her, the amount of which cannot currently be determined as the damages are continuing, along with her costs, expenses, and attorneys' fees against Counterclaim Plaintiffs in connection with this matter.

4. Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

**DISCLOSURE:** None.

Dated this 12 day of June, 2018.

Respectfully Submitted,

KLAR, IZSAK & STENGER, L.L.C.

By:



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**CERTIFICATE OF SERVICE**

I hereby certify that on **June 12, 2018**, the foregoing was service by first class mail, postage prepaid, to the following:

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